

# **EXHIBIT B**

1 UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA

3 CIVIL ACTION NO.  
4 BOARHEAD FARM AGREEMENT 02-CV-3830  
5 GROUP, Judge Legrome D. Davis  
6 Plaintiff, Oral Deposition of

7 vs. MANFRED T. DE REWAL, SR.

8 ADVANCED ENVIRONMENTAL TECHNOLOGY  
9 CORPORATION; ASHLAND CHEMICAL  
10 COMPANY; BOARHEAD CORPORATION;  
11 CARPENTER TECHNOLOGY CORPORATION;  
12 CROWN METRO, INC.; DIAZ CHEMICAL  
13 CORPORATION; EMHART INDUSTRIES,  
14 INC.; ETCHED CIRCUITS, INC.; FCG,  
15 INC.; GLOBE DISPOSAL COMPANY, INC.;  
16 GLOBE-WASTECH, INC.; HANDY & HARMAN  
17 TUBE COMPANY, INC.; KNOLL, INC.;  
18 MERIT METAL PRODUCTS CORPORATION;  
19 NOVARTIS CORPORATION; NRM INVESTMENT  
20 COMPANY; PLYMOUTH TUBE COMPANY;  
21 QUIKLINE DESIGN AND MANUFACTURING  
22 COMPANY; RAHNS SPECIALTY METALS,  
23 INC.; ROHM & HAAS COMPANY, SIMON  
24 WRECKING COMPANY, INC.; TECHALLOY  
25 COMPANY, INC.; THOMAS & BETTS  
CORPORATION; UNISYS CORPORATION;  
UNITED STATES OF AMERICA  
DEPARTMENT OF NAVY,  
Defendants.

17 \* \* \* \* \*  
18 Thursday, May 8, 2003  
19 \* \* \* \* \*

20 Transcript in the above matter taken at  
21 the offices of Ballard, Spahr, Andrews & Ingersoll,  
22 LLP, 1735 Market Street, 42nd Floor, Philadelphia,  
23 Pennsylvania, commencing at 10:15 A.M.

24 Certified Shorthand Reporting Services  
25 Arranged Through  
Mastroianni & Formaroli, Inc.  
709 White Horse Pike  
Audubon, New Jersey 08106  
(856) 546-1100

ORIGINAL

1 Q. When was the first time you heard of  
2 Handy & Harman Tube Company?

3 A. I don't know.

4 Q. How did you learn about Handy & Harman  
5 Tube Company?

6 A. I don't know.

7 Q. Do you know, and I apologize if you  
8 answered this in response to another question, do you  
9 know what the business of Handy & Harman Tube Company  
10 is?

11 A. No.

12 Q. Are you familiar with any of the  
13 processes used by Handy & Harman Tube Company?

14 A. No.

15 Q. Are you familiar with the types of waste  
16 generated by Handy & Harman Tube Company?

17 A. No.

18 Q. Mr. DeRewal, if you would turn to P-42  
19 which was marked yesterday, do you have P-42 in front  
20 of you?

21 A. Yes, I have.

22 Q. Does P-42 represent a typical DeRewal  
23 Chemical Company invoice?

24 A. Yes.

25 Q. If you would just look across the top

1 Q. And the last column says invoice number?

2 A. Correct.

3 Q. Looking under the column terms, does  
4 that say 1 percent 10 and 30?

5 A. Right.

6 Q. And can you tell us what 1 percent 10  
7 and 30 means?

8 A. That's the discounting, 1 percent if you  
9 pay within 10 days, the net is due in 30.

10 Q. And under invoice number, I believe it  
11 says N2571; would you agree with that?

12 A. Yes.

13 Q. Do you know what the N2 stands for?

14 A. No, I do not.

15 Q. Going to the next preprinted line, first  
16 column, that would be quantities; is that correct?

17 A. Yes.

18 Q. And the next section, next column would  
19 be the description?

20 A. Yes.

21 Q. And the next column would be the price?

22 A. Right.

23 Q. And the last column would be the amount?

24 A. Correct.

25 Q. Do you know what DeRewal Chemical

1 drums were full or empty?

2 A. No, I do not know.

3 Q. Do you know whether the 36 30-gallon  
4 drums were being delivered to or being picked up from  
5 Handy & Harman Tube Company?

6 A. No, but the invoice would suggest that  
7 they are being picked up. They have waste solution  
8 in them.

9 Q. But you don't know as you sit here today  
10 whether they were being picked up from or delivered  
11 to Handy & Harman Tube Company; is that correct?

12 MR. HARRIS: Objection.

13 A. No, I wouldn't -- I wouldn't know what  
14 they were -- just looking at this invoice, you know,  
15 I don't think Handy & Harman is ordering waste  
16 solutions. I think they are getting rid of waste  
17 solutions. I mean --

18 Q. Mr. DeRewal, I didn't ask you what you  
19 think. I asked you whether you knew or did not know.

20 A. I absolutely do not know.

21 Q. Okay. Can you tell me what the \$6 per  
22 55-gallon drum price represents?

23 A. What?

24 Q. Looking in the third column under the  
25 second preprinted line where it says price, second

1 line down says \$6 each.

2 A. Right.

3 Q. Can you tell me what the \$6 per  
4 55-gallon drum price represents?

5 A. No.

6 Q. Can you tell me what the \$5 per  
7 30-gallon drum price represents?

8 A. No.

9 Q. Can you tell me what the \$25 per  
10 250-gallon oil tank price represents?

11 A. No.

12 Q. Looking at the first preprinted line on  
13 P-42 in the third column which says shipped via, do  
14 you know what the reference to "our truck" means?

15 A. Well, this is DeRewal invoice, so our  
16 truck means a DeRewal -- a DeRewal truck.

17 Q. If you look at the bottom of P-42,  
18 MrDeRewal --

19 A. Yes.

20 Q. -- there's a marking on the bottom.

21 A. Yes.

22 Q. Do you know what that is?

23 A. No, I do not.

24 Q. Is that a signature of some sort?

25 A. I thought that was his marking. I mean,